

Fact Sheet



For Draft/Proposed Renewal Permitting Action Under 45CSR30 and Title V of the Clean Air Act

Permit Number: **R30-00900083-2011**
Application Received: **November 1, 2010**
Plant Identification Number: **009-00083**
Permittee: **Murphy Consolidated Industries, Inc.**
Facility Name: **Murphy Field**
Mailing Address: **Post Office Box 70, Beech Bottom, WV 26030**

Revised: *(Date of Revision)*

Physical Location: Follansbee, Brooke County, West Virginia
UTM Coordinates: 533.9 Easting • 4463.5 Northing • Zone 17
Directions: Near the north end of Follansbee, when traveling north on State Route 2
turn left onto Koppers Road at traffic signal, follow Koppers Road and
cross over railroad tracks and turn left at next facility entrance.

Facility Description

Murphy Consolidated Industries, Inc. operates two coke screening stations at its facility. The two screening stations receive coke from Wheeling-Pittsburgh Steel Corporation coke oven batteries for classification into three sizes. Each screening station consists of a feed hopper, one stock coke conveyor that transports the coke to the three-deck screen unit, and three conveyors that carry the size-classified coke to its respective surge pile. The facility is SIC Code 3299.

Emissions Summary

Plantwide Emissions Summary [Tons per Year]		
Regulated Pollutants	Potential Emissions	2009 Actual Emissions
Carbon Monoxide (CO)	0	
Nitrogen Oxides (NO _x)	0	
Lead (Pb)	0	

Particulate Matter (PM ₁₀)	0.9630	0.06
Total Particulate Matter (TSP)	4.0315	0.14
Sulfur Dioxide (SO ₂)	0	
Volatile Organic Compounds (VOC)	0	

PM₁₀ is a component of TSP.

Title V Program Applicability Basis

Based upon the location of Murphy Consolidated Industries (hereinafter called, "Murphy"), the "support facility" definition provided in EPA guidance (40CFR§51.165.a.1.viii.), and the business relationship with Mountain State Carbon LLC (MSC), it was determined that Murphy and MSC are considered one source for Title V applicability purposes. Furthermore, it was determined and agreed upon that MSC's Title V permit would be separate from Murphy's Title V permit. These determinations were documented in a letter from the WV DAQ to Alan McLaughlin, President of Murphy Consolidated, dated January 18, 2005. Therefore, Murphy Consolidated Industries' facility is required to have an operating permit pursuant to Title V of the Federal Clean Air Act as amended and 45CSR30.

Legal and Factual Basis for Permit Conditions

The State and Federally-enforceable conditions of the Title V Operating Permits are based upon the requirements of the State of West Virginia Operating Permit Rule 45CSR30 for the purposes of Title V of the Federal Clean Air Act and the underlying applicable requirements in other state and federal rules.

This facility has been found to be subject to the following applicable rules:

Federal and State:	45CSR6	Open burning prohibited.
	45CSR7	Control of Particulate Matter Pollution from Manufacturing Processes
	45CSR7A	Compliance Test Procedures for 45CSR7
	45CSR11	Standby plans for emergency episodes.
	45CSR13	
	WV Code § 22-5-4 (a) (14)	The Secretary can request any pertinent information such as annual emission inventory reporting.
	45CSR30	Operating permit requirement.
State Only:	40 C.F.R. Part 61	Asbestos inspection and removal
	40 C.F.R. Part 82, Subpart F	Ozone depleting substances
State Only:	45CSR4	No objectionable odors.
	45CSR42	Greenhouse Gas Emissions Inventory Program

Each State and Federally-enforceable condition of the draft Title V Operating Permit references the specific relevant requirements of 45CSR30 or the applicable requirement upon which it is based. Any condition of the draft Title V permit that is enforceable by the State but is not Federally-enforceable is identified in the draft Title V permit as such.

The Secretary's authority to require standards under 40 C.F.R. Part 60 (NSPS), 40 C.F.R. Part 61 (NESHAPs), and 40 C.F.R. Part 63 (NESHAPs MACT) is provided in West Virginia Code §§ 22-5-1 *et seq.*, 45CSR16, 45CSR34 and 45CSR30.

Active Permits/Consent Orders

Permit or Consent Order Number	Date of Issuance	Permit Determinations or Amendments That Affect the Permit (<i>if any</i>)
R13-2548A	July 20, 2005	

Conditions from this facility's Rule 13 permit(s) governing construction-related specifications and timing requirements will not be included in the Title V Operating Permit but will remain independently enforceable under the applicable Rule 13 permit(s). All other conditions from this facility's Rule 13 permit(s) governing the source's operation and compliance have been incorporated into this Title V permit in accordance with the "General Requirement Comparison Table B," which may be downloaded from DAQ's website.

Determinations and Justifications

The facility's Title V initial permit was issued on April 12, 2006. Since the initial permit, there have been no equipment changes at the facility. The following changes have been made in Title V permit language.

- **45CSR42 – Greenhouse Gas Emissions Inventory Program.**
This facility is subject to 45CSR42. Refer to permit conditions 3.1.14 and 3.5.10 for the requirements pursuant to this rule. The language of the condition 3.5.10 is substantially that which is at 45CSR§42-4, with only revisions to referencing language and the word "Secretary" changed to "Director".
- The Title V permit boilerplate has been revised such that a new Section 1.2 Table has been added which lists all the active R13, R14, and/or R19 permits and their date(s) of issuance. Also, the underlying authority for any conditions from the R13, R14, and/or R19 permits has been changed to cite the original permit number in the Title V permit. These changes will eliminate the need to go through the entire Title V permit to change the R13, R14, and/or R19 permit numbers each time an R13, R14, and/or R19 permit is modified. The only required change will be to the Section 1.2 Table.
- Region 3 has requested that all annual compliance certifications be submitted electronically (e-mail), so the permit templates have been updated in conditions 3.5.3. and 3.5.5.

Non-Applicability Determinations

The following requirements have been determined not to be applicable to the subject facility due to the following:

45CSR17 - To Prevent and Control Particulate Matter Air Pollution from Material Handling, Preparation, Storage and Other Sources of Fugitive Particulate Matter - Paragraph 2.3 of this rule defines fugitive particulate matter as particulate matter which becomes airborne from activities including, but not limited to: handling, transporting or storage of materials. The definition given in the rule also includes haul roads, plant grounds, and any other activity which generates airborne particulate matter. The permittee's facility is characterized by these sources of fugitive particulate matter, which would make the permittee subject to the rule. However, in the Exemptions paragraph 6.1 of the rule, a facility that is subject to 45CSR7 shall be exempt from the provisions of this rule, provided that such sources shall not be exempt from the provisions of W. Va. Code §§22-5-1 *et seq.*, including the provisions of §22-5-3 relating to statutory air pollution. The permittee is subject to 45CSR7; therefore, the facility is not subject to 45CSR17.

40 C.F.R. Part 60, Subpart OOO - Standards of Performance for Nonmetallic Mineral Processing Plants - The permittee processes coke (a nonmetallic mineral) using feed hoppers and conveyors supplying

screening stations. In §60.670(a)(1) screening operations and belt conveyors used to process nonmetallic minerals are listed as applicable sources, except as provided in paragraphs (a)(2), (b), (c) and (d) of the applicability section in the rule. In paragraph (a)(2) of the applicability section, stand-alone screening operations at plants without crushers or grinding mills are excluded from being subject to this regulation. The facility does not have a crusher or grinding mill on-site; therefore, the facility is not subject to this NSPS.

Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule.

The facility has not made any changes that trigger a PSD modification; therefore, the requirements of the GHG tailoring rule are non-applicable.

40 CFR 64-Compliance Assurance Monitoring. Murphy Consolidated Industries, Inc. is not a major source of any regulated air pollutant. Therefore, in accordance with 40 C.F.R. § 64.2(a), CAM is not applicable to this facility.

Request for Variances or Alternatives

None

Insignificant Activities

Insignificant emission unit(s) and activities are identified in the Title V application.

Comment Period

Beginning Date: March 4, 2011
Ending Date: April 4, 2011

All written comments should be addressed to the following individual and office:

Beena Modi
Title V Permit Writer
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304

Procedure for Requesting Public Hearing

During the public comment period, any interested person may submit written comments on the draft permit and may request a public hearing, if no public hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. The Secretary shall grant such a request for a hearing if he/she concludes that a public hearing is appropriate. Any public hearing shall be held in the general area in which the facility is located.

Point of Contact

Beena Modi
West Virginia Department of Environmental Protection
Division of Air Quality
601 57th Street SE
Charleston, WV 25304
Phone: 304/926-0499 ext. 1228 • Fax: 304/926-0478

Response to Comments (Statement of Basis)

Describe response to comments that are received and/or document any changes to the final permit from the draft/proposed permit.